

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**NOTICE OF MOTION  
TO FILE UNDER SEAL:  
Defendant's Motion  
To Withdraw**

**SIMON GOGOLACK**

Defendant

23-CR-99

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PLEASE TAKE NOTICE, that upon the attached Affirmation of John M. Ange, attorney for Defendant Simon Gogolack, the defense now moves **Hon. Lawrence J. Vilardo**, District Judge, for an Order:

1. **Sealing Defendant's Motion to Withdraw**: Sealing Defendant's Motion to Withdraw, for the reasons set forth in the Supporting Affidavit submitted to chambers.

/s/ John M. Ange  
John M. Ange  
*Attorney for Simon Gogolack*  
Convention Towers  
43 Court Street  
Suite 610  
Buffalo, New York 14202  
(716) 430-3203 [mobile]  
[johnangel12@outlook.com](mailto:johnangel12@outlook.com)

To: **Hon. Lawrence J. Vilardo**  
District Court Judge  
Western District of New York  
2 Niagara Square, Buffalo, New York 14202

**Casey Chalbeck**  
United States Attorney's Office  
138 Delaware Avenue, Buffalo, New York 14202

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**SIMON GOGOLACK**

Defendant

**ATTORNEY'S AFFIRMATION  
IN SUPPORT OF MOTION  
TO FILE UNDER SEAL:  
Defendant's Motion  
To Withdraw**

23-CR-99

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John M. Ange, Esq., an attorney duly licensed to practice in the United States District Court, Western District of New York, affirms:

1. I represent the Defendant, Simon Gogolack.
2. I seek an order sealing the defendant counsel's Motion to Withdraw, an un-redacted hard copy of which has been served or will be served on the Court and counsel, for the reasons set forth in the submitted Sealing Affidavit, a hard copy of which has been served or will be served on the Court and counsel.

WHEREFORE, the defense seeks the relief set out in the attached NOTICE OF MOTION.

Dated: July 16, 2025  
Buffalo, New York

/s/ John M. Ange  
John M. Ange  
*Attorney for Simon Gogolack*  
Convention Towers  
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Suite 610  
Buffalo, New York 14202  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

**CERTIFICATE OF SERVICE**

**SIMON GOGOLACK**

Defendant

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23-CR-99

I hereby certify that on July 16, 2025, I electronically filed this **MOTION TO FILE DEFENDANT'S MOTION TO WITHDRAW UNDER SEAL** with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following participants in this case:

- 1) **Casey Chalbeck**, Assistant United States Attorney

/s/ John M. Ange  
John M. Ange  
*Attorney for Simon Gogolack*  
Convention Towers  
43 Court Street  
Suite 610  
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